

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Lynne Freeman,

Plaintiff,

v.

Tracy Deebs-Elkenaney, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

**AFFIDAVIT IN SUPPORT OF MOTION  
FOR ADMISSION PRO HAC VICE**

I, Stephen M. Doniger, an attorney at DONIGER / BURROUGHS duly admitted to practice in the courts of the State of California, hereby swear under penalty of perjury and state as follows pursuant to Local Civil Rule 1.3(c):

1. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
2. There are no pending disciplinary proceedings against me in any State or Federal Court.
3. I have never been convicted of a felony.
4. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

Dated: March 10, 2023

Laurence Campbell  
Notary Public, State of New York  
No. 01CA6200635  
Qualified in New York County  
Commission Expires 4/6/2025

Respectfully Submitted,

By:   
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